

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (MG)
(Jointly Administered)

Debtors.
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**ORDER PURSUANT TO FED. R. BANKR. P. 9006(b)
EXTENDING THE DURATION OF THE AVOIDANCE ACTION TRUST**

Upon the motion (the “**Motion**”), dated June 13, 2016, of Wilmington Trust Company, in its capacity as trust administrator and trustee (in such capacity, the “**Avoidance Action Trust Administrator**”) of the Motors Liquidation Company Avoidance Action Trust (the “**Avoidance Action Trust**”) established under Article VI of the *Debtors’ Second Amended Joint Chapter 11 Plan*, dated as of March 18, 2011, seeking entry of an order pursuant to Rule 9006(b) of the Federal Rules of Bankruptcy Procedure and section 4.1 of the Amended and Restated Motors Liquidation Company Avoidance Action Trust Agreement dated as of May 11, 2012 (as amended, the “**Avoidance Action Trust Agreement**”) extending the duration of the Avoidance Action Trust for an additional 36 months, through and including December 15, 2019, all as more fully described in the Motion; and any objections to the Motion having been settled, resolved, withdrawn or overruled; and this Court having determined that the relief requested in the Motion is in the best interests of the above-captioned post-effective date debtors’ creditors and estates; and it further appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and after due deliberation thereon, and good and sufficient cause appearing therefor:

IT IS HEREBY:

ORDERED, that the relief requested in the Motion is granted to the extent provided herein; and it is further

ORDERED, that the duration of the Avoidance Action Trust, as described in section 4.1 of the Avoidance Action Trust Agreement, is extended an additional 36 months and the Avoidance Action Trust shall remain in full force and effect through and including December 15, 2019; and it is further

ORDERED, that this Order is without prejudice to the right of the Avoidance Action Trust Administrator to seek authority to further extend or shorten the duration of the Avoidance Action Trust upon application of the Avoidance Action Trust Administrator to this Court in accordance with the Avoidance Action Trust Agreement; and it is further

ORDERED, that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2016
New York, New York

UNITED STATES BANKRUPTCY JUDGE